

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re: Methyl Tertiary Butyl Ether (“MTBE”)  
Products Liability Litigation**

**This document relates to:  
ALL CASES**

**Master File No. 1:00 – 1898  
MDL No. 1358 (VSB)**

**MOTION FOR ADMISSION PRO HAC VICE FOR GRAHAM C. ZORN**

Pursuant to Rule 1.3 of the Local Rules of the United States Court for the Southern District of New York, Graham C. Zorn hereby moves this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Defendants Sunoco, Inc. (f/k/a Sun Company, Inc.); Sunoco (R&M) LLC (f/k/a Sunoco Inc. (R&M)); Sunoco Partners Marketing & Terminals LP; ETP Holdco Corporation; Energy Transfer Partners, LP; and Puerto Rico Sun Oil Company LLC in the above-captioned action.

I am a member in good standing of the bars of the State of Wisconsin and the District of Columbia. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

Dated: March 25, 2019

Respectfully submitted,

/s/ Graham C. Zorn

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